UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

:

:

11 Civ. 2564 (LBS)

٧.

POKERSTARS, et al.,

Defendants:

VERIFIED CLAIM OF

FILCO LTD PURSUANT TO RULE G OF THE

ALL RIGHT, TITLE AND INTEREST IN THE ASSETS OF POKERSTARS, et al.,

SUPPLEMENTAL RULES FOR ADMIRALTY AND

MARITIME CLAIMS

Defendants-in-rem.

PLEASE TAKE NOTICE that Defendant, Filco Ltd. ("Filco"), pursuant to 18 U.S.C. § 983(a)(4) and Rule G(5)(a), Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, hereby asserts, under penalty of perjury, right, title and interest in, and makes a claim upon, the property identified below in the above-captioned case.

- 1. Filco has right, title, or interest to all funds in the following accounts:
 - A. account held at Allied Irish Bank in the name of Filco Ltd, IBAN IE85AIBK93006727971082, and all funds traceable thereto;
 - B. account held at WestLB AG, Germany, in the name of Filco Ltd, IBAN DE19512308000000007262, and all funds traceable thereto.
- 2. Filco has right, title, or interest in any other account seized by the government pursuant to the above captioned forfeiture in rem action that contains properties subject to Filco's legal and equitable ownership.
- 3. Filco is the lawful owner and the party that held legal title to the bank accounts referenced in paragraph 1 prior to the seizure.

- 4. Filco has a right, title, or interest in all of its tangible and intangible assets.
- Filco Ltd. is an Alderney company with its principal place of business in Guernsey,
 Alderney.
- 6. Pursuant to Rule E(8) of the Supplemental Rules, Filco appears before this Court for the limited purpose of defending against claims initiated by the government in the above-captioned in rem action. Filco's appearance in the above-captioned action does not constitute an appearance for the purpose of any other claim or consent to the jurisdiction of this court or any other court over Filco.
- 7. As an authorized agent of claimant Filco Ltd., I, CHRIS FERGUSON, hereby verify that the foregoing facts are true and correct and made under penalty of perjury.

Pursuant to the provisions of 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 14 of November, 2011

Chris Ferguson
Chris Ferguson
Chris Ferguson

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on November 14, 2011, I caused a true copy of the foregoing Verified Claim Pursuant to Rule G(5)(a) of the Supplemental Rules for Certain Admiralty and Maritime Claims to be served by the Court's ECF system upon:

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/s/ L. Barrett Boss

L. Barrett Boss